

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></p> <p>Debtors.<sup>1</sup></p>	<p>PROMESA</p> <p>Title III</p> <p>No. 17 BK 3283-LTS</p> <p>No. 17 BK 4780-LTS</p> <p>(Jointly Administered)</p>
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**INFORMATIVE MOTION OF WHITEFISH ENERGY HOLDINGS, LLC REGARDING  
NOVEMBER 13, 2017 HEARING AT 1:30 P.M. (AST) ON URGENT MOTION OF  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ORDER, UNDER 11  
U.S.C. § 1103 AND BANKRUPTCY RULE 2004, AUTHORIZING DISCOVERY WITH  
RESPECT TO PREPA ENGAGEMENT OF WHITEFISH ENERGY HOLDINGS, LLC  
AND URGENT REQUEST FOR HEARING**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gaiel Dein:

Comes now Whitefish Energy Holdings, LLC through its undersigned counsel, and very respectfully its informative motion in response to the Court's order, dated November 1, 2017 (Docket No. 369) (the "Scheduling Order") and respectfully states and prays as follows:

1. Attorney Ann Marie Uetz will appear in person on behalf of Whitefish Energy Holdings, LLC., in Courtroom 17C of the United States District Court for the Southern District of New York, and address, as necessary, the following matters:
  - a. *Urgent Motion of Official Committee of Unsecured Creditors for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery With Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for Hearing* (the "Urgent Motion", Docket No. 364)
  - b. *Limited Objection by Whitefish Energy Holdings, LLC to Motion by Official Committee of Unsecured Creditors for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery with Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for Hearing* (the "Limited Objection", Docket No. 394)
  - c. Any other response or Joinder to the Urgent Motion or Limited Objection
  - d. Any statement made by any party in connection with the title III case or any adversary proceeding pending therein.
2. Whitefish Energy Holdings, LLC., anticipates that only attorney Ann Marie Uetz will attend the November Omnibus Hearing at the United States District Court for the Southern District of New York.

3. In addition, attorneys Carmen D. Conde Torres & Luisa Valle Castro of C. Conde & Assoc., on behalf of Whitefish Energy Holdings, LLC., will attend the November Omnibus Hearing at the United States District Court for the District of Puerto Rico.

**WHEREFORE**, Whitefish Energy Holdings, LLC., respectfully request that the Court take notice of the above stated.

**RESPECTFULLY SUBMITTED,**

In San Juan Puerto Rico, this 8<sup>th</sup> day of November, 2017

**FOLEY & LARDNER LLP**

*/s/Ann Marie Uetz*

Ann Marie Uetz

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and

**C. CONDE & ASSOC.**

*/s/Carmen D. Conde Torres*

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*/s/Luisa S. Valle Castro*

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Local Counsel for Whitefish Energy Holdings, LLC.